

GLAVIN PLLC
2585 Broadway #211
New York, New York 10025
646-693-5505

July 28, 2021

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/28/2021

Re: United States of America v. Jason Servis et al., 20 Cr. 160-10 (MKV)

Dear Judge Vyskocil:

I represent Jason Servis in this matter, and I write to request a brief extension until Monday August 2, to file our motions to suppress, which are due tomorrow. Robert Baum, counsel to Alexander Chan, joins in this request for a brief adjournment to August 2. The Government has no objection to our request.

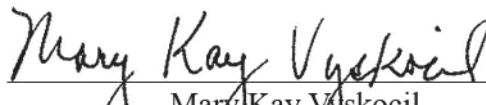
We make this request because we just learned that our co-defendant in Counts Three and Four—Kristian Rhein—will be entering a guilty plea and not filing any motions to suppress. Until today, we fully expected Mr. Rhein would be filing a motion to suppress the T-III wiretaps on his cellular phone, over which both of our clients were intercepted. To that end, we planned to join his motion and incorporate his arguments and exhibits by reference. Because Mr. Rhein is pleading guilty and not filing any such motions, we must now raise those arguments in our own motions. We need the additional time to integrate these arguments into our brief.

Respectfully submitted,

_____/s/_____
Rita M. Glavin

**GRANTED. Absent further order of the Court all other motion deadlines (for other Defendants and for the Government's opposition) remain in effect.
SO ORDERED.**

Date: 7/28/2021
New York, New York


Mary Kay Vyskocil
United States District Judge